

REMARKS/ARGUMENTS

Applicant would like to thank the Examiner for the careful consideration given the present application. In particular, Applicant acknowledges the allowance of claims 1–17, 29–32, and 40–43. The application has been carefully reviewed in light of the Office Action, and amended as necessary to more clearly and particularly describe the subject matter that Applicant regards as the invention.

Claims 1-3, 6, 7, 11, 12, 14, 15, 18, 21, 27, 28, and 33–36 are amended. Claims 4, 8, 13, 17, 37–39, and 44 are cancelled without prejudice or disclaimer; and claims 45–51 are new and fully supported by the specification as originally filed.

Claims 18–28, 33, 35–39 and 44 are rejected under 35 U.S.C. 102(e) as being anticipated by Ito et al. (U.S. Patent No. 6,542,816). Applicant respectfully disagrees for at least the following reasons. Claims 37–39 and 44 have been cancelled without prejudice or disclaimer, thus rendering the rejection moot. Regarding amended claim 18, from which claims 19–28 depend, Ito et al. does not disclose or teach a method for identifying position of a target road section on a digital map that comprises, among other things, selecting nodes including coordinate information from the target road section on the first digital map on a predetermined condition. Similarly, Ito et al. does not disclose or teach an apparatus for providing position information indicating a target road section on a first digital map to a receiving side having a second digital map so that the receiving side can identify the target road section on the second digital map, whereby the apparatus comprises means for identifying a target road section on a digital map; means for selecting node groups from points arranged on the target road section on a first digital map on a predetermined condition; means for creating position information using the selected

nodes; and means for transmitting the position information to the receiving side, as recited in amended claim 33.

Regarding amended claim 35, from which claim 36 depends, Ito et al. also does not disclose or teach an apparatus for identifying position of a target road section on a digital map at a receiving side based on position information including supplementary information on a digital map at a transmitting side that comprises means for receiving the position information; means for determining position of nodes representing the target road section on the digital map at the receiving side based on the received position information; means for calculating a path between the identified nodes; and means for identifying the target road section on the digital map at the receiving side using the path, wherein at least one of the calculating step and the identifying step is performed using the supplementary information. Therefore, Ito et al. does not disclose each and every element of claims 18–28, 33, and 35–36 of the subject application; and the rejection should be withdrawn.

Claim 34 is rejected under 35 U.S.C. 103(a) for being unpatentable over Ito et al. (U.S. Patent No. 6,542,816) in view of Ito et al. (U.S. Patent No. 6,249,740 – referred to as “Ito et al. ‘740”). Applicant respectfully disagrees for at least the following reasons. Ito et al. does not disclose an apparatus for providing position information indicating a target road section on a first digital map to a receiving side having a second digital map so that the receiving side can identify the target road section on the second digital map, as recited in claim 34. In particular, Ito et al. fails to disclose or teach means for selecting a predetermined section from the target road section; means for selecting nodes from points arranged on the target road section in such manner that nodes are selected more thickly in the predetermined section than the other section of the target road section; means for obtaining coordinate information of the selected nodes; and

means for creating position information from the obtained coordinate information, as recited in claim 34. Ito et al. '740 fails to cure the aforementioned deficiencies. In particular, Ito et al. '740 does not teach or suggest means for selecting nodes from points arranged on the target road section in such manner that nodes are selected more thickly in the predetermined section than the other section of the target road section. Thus, claim 34 would not have been obvious to one of ordinary skill in the art at the time the invention was made by combining the cited documents.

In light of the foregoing, it is respectfully submitted that the present application is in condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. 34825US1.

Respectfully submitted,
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